

IN THE UNITED STATES DISTRICT COURT copy  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (1)

JOHN RICHARD JAE,  
Plaintiff

HARRISBURG

JUN 27 2001

VS.

C.O. LESTER,

Defendant.

MARY E. D'ANDREA, CLERK

Per STG  
DEPUTY CLERK

V.S. - District Judge  
Magistrate Judge

# MOTION FOR ENLARGEMENT OF TIME

Comes Now, the Plaintiff, John Richard Jae, a Layman Unlettered in the Arts & Sciences of the Law, Plaintiff within the United States, who, now files his Motion For Enlargement of Time pursuant to Fed. R. Cr. P. 6(), who, avers, deposes & states =

1. On or About March 27, 2001, Defendant Co-Lester, by Counsel filed his Motion to Revoke Plaintiff's In Forma Pauperis Status And Stay of Proceedings And On April 10, 2001, filed his Brief in Support of such Motion, herein this case.

2. Plaintiff's Brief in opposition to Defendant's Motion to Revoke Plaintiff's In Forma Pauperis Status And Stay of Proceedings And Brief in Support of such Motion, presently due to be filed & served herein this case, on or before June 22, 2001, due to the facts that Prison Officials/Staff here at S.C. Greene illegally denied me sufficient access to my stored property which I need to locate, retrieve & take back to my cell with me, Case File/Papers, Legal Materials & Law Books in the above-captioned which I need first in order to enable me to prepare & file & serve Plaintiff in opposition to Defendant's Motion to Revoke Plaintiff's In Forma Pauperis Status And Stay of Proceedings And Brief in Support, herein this case. Officials here are also illegally denying this Plaintiff enough paper & paper to prepare his Brief in opposition to Defendant's Motion to Revoke In Forma Pauperis Status And Stay of Proceedings And Brief in Support & are likewise illegally denying him the Large Legal Size Envelope which he needs to file & serve such Pleading of his, herein this case when he is totally financially indigent with no money at all with which to buy such paper carbon paper and envelopes himself.

3. Simultaneously with this here Motion, this Plaintiff is filing his Petition For Writ of Mandamus And Brief in Support thereof requesting that the Prison Officials to forth with return all his papers & legal materials to him here on

are to provide this Plaintiff with enough Paper & Can Paper, so that he can prepare & file his legal pleading/Brief in Opposition in this case & that they are to provide this Plaintiff with two (2) Legal Envelopes to mail such Brief to this Court and to Counsel for the Defendant, herein this case, and this Court will need time to rule on such Petition, herein this case:

(W) HEREBY, based upon & given the above & foregoing Plaintiff John Richard Jae, Prays that this Court will grant this Motion & grant him an enlargement of time of (30) days to & including July 22, 2001, in which to file his Brief in Opposition to Defendant's Motion to Revoke Plaintiff's In Forma Pauperis Status And Stay of Proceed And Brief in Support, herein this Civil Rights Action:

Dated: 20th JUNE 2001:

AND HE SHALL EVER  
RESPECTFULLY SUBMIT  
*John Richard Jae*  
(S) MR. John R. Jae,  
#BQ-3219  
SCL-Greene/SMU  
175 Progress Drive  
Waynesburg, PA. 15370  
Plaintiff and Pro Se

Joe V. G. O. Lester  
CIV No. 1:01-cv-00041

CERTIFICATE OF SERVICE

I certify that on 6-22-01, I mailed to the person listed,  
a true and correct carbon copy of each of Plaintiff's  
Petition For writ of mandamus and Brief In  
Support and Motion For Enlargement  
of time, by way of U.S. 1st class  
mail, postage prepaid and  
addressed to:

Ms. Victoria S. Freeman,  
Assistant Counsel  
Office of the Chief Counsel  
Pennsylvania Dept. of Corrections  
55 Utley Drive  
Camp Hill, PA 17011

I certify that on 6/22/01, I gave to prison officials here  
mailing to this court, the originals of each of the above-named  
documents:

I certify under penalty of perjury & pursuant to 28 U.S.C. § 1746,  
the above is true & correct:

Dated/Executed on:  
22nd JUNE 2001:  
At: Waynesburg, Pennsylvania:

(s) John Richard J  
MR. JOHN RICHARD J  
#BQ-3219  
SCI-Groene/SMU  
175 Progress Drive  
Waynesburg, PA 15370  
Plaintiff and As Sec Coun